

**THE STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT**

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Appeal from Horry County  
Court of Common Pleas

J. Mark Hayes, II, Circuit Court Judge

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Appellate Case No. 2020-001107  
Case No. 2018-CP-42-03447

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Estate of Barbara Owens, by and through her Personal  
Representative, Mary Jane McCraw, Individually and on behalf of  
Statutory Beneficiaries,

Respondent,

v.

Fundamental Clinical and Operational Services, LLC; Fundamental  
Administrative Services, LLC; THI of South Carolina, LLC; THI Of  
South Carolina at Spartanburg, LLC d/b/a Magnolia Manor-  
Spartanburg,

Petitioners.

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**SECOND MOTION FOR EXTENSION OF TIME TO  
SERVE/FILE PETITION FOR WRIT OF CERTIORARI**

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CLEMENT RIVERS, LLP  
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*Attorneys for Petitioners*

NOW COME Petitioners, Fundamental Clinical and Operational Services, LLC, Fundamental Administrative Services, LLC, THI of South Carolina, LLC, and THI Of South Carolina at Spartanburg, LLC d/b/a Magnolia Manor-Spartanburg, by and through their undersigned counsel, on the grounds stated below, pursuant to Rule 263(b), SCACR, as well as the Court's order of July 16, 2014, regarding Extensions in Cases Seeking a Petition for a Writ of Certiorari to Review a Decision of the South Carolina Court of Appeals, and hereby move for a second extension of ten (10) days' time to file/serve their petition to this Court for issuance of a writ of certiorari to the Court of Appeals to review its decision in this matter.

Pursuant to the Court of Appeals' order denying the petition for rehearing dated September 15, 2023, and Rule 242(c), SCACR, the original deadline for the petition for writ of certiorari was October 16, 2023. Previously, via motion filed October 13, 2023, the Petitioners sought a 10 day extension of this deadline, which, if granted, would extend the deadline to October 26, 2023. This motion has not yet been acted upon by the Court.

Due to other time commitments, both work- and non-work-related, the undersigned counsel for Petitioners requests ten (10) additional days to prepare Petitioners' petition seeking this Court's review of the Court of Appeals' decision via writ of certiorari, and the undersigned submits there is good cause to allow the requested dispensation: It is in furtherance of the interests of justice; it will not work

any undue prejudice upon any other party; and it is consistent with the extension protocol established by the Court's aforementioned order of July 16, 2014.

WHEREFORE, Petitioners respectfully request this Honorable Court grant them an extension of ten (10) days' time to file/serve their petition for writ of certiorari. With the extension requested herein, the new deadline for filing/serving their petition for writ of certiorari would be November 6, 2023, according to the undersigned's calculations. Further, Petitioners respectfully request the Court hold this present deadline in abeyance until it acts upon this motion.

*[Signature page for Second Motion for Extension of Time to Serve/File  
Petition for Writ of Certiorari, Appellate Case No. 2020-001107]*

Respectfully submitted,

CLEMENT RIVERS, LLP

By: *s/Russell G. Hines*  
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October 25, 2023